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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ANIBAL RODRIGUEZ, et al. individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**JOINT STIPULATION RE: POST-
TRIAL BRIEFING SCHEDULE**

Judge: Hon. Richard Seeborg
Courtroom: 3, 17th Floor

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al. (“Plaintiffs”)
2 and Defendant Google LLC (“Google”), collectively referred to as the “Parties,” hereby enter into
3 this joint stipulation.

4 WHEREAS, on September 22, 2025, the Court convened a case management conference to
5 discuss the remaining briefing and motion practice,

6 WHEREAS, during the September 22, 2025 case management conference, the Court
7 directed the Parties to meet and confer regarding a schedule to file the remaining briefs and motions,

8 WHEREAS, it is Google’s understanding that pursuant to Federal Rule of Civil Procedure
9 23(c)(1)(C), the motion for decertification must be decided before final judgment is entered,

10 WHEREAS, the Parties have reached agreement on a schedule for post-trial briefing and
11 motion practice, and

12 WHEREAS, the Parties propose to the Court that Plaintiffs’ motion on disgorgement and
13 injunctive relief either be filed in two separate briefs or one 40-page brief, depending on the Court’s
14 preference,

15 WHEREAS, by agreeing to the below deadlines, the Parties reserve all rights to oppose any
16 relief sought and do not agree that either party is entitled to any relief.

17 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the
18 Parties:

19 (1) No later than October 22, 2025, Plaintiffs shall file either two opening briefs or a single
20 40-page opening brief on disgorgement and injunctive relief, and Google shall file its
21 opening brief on class decertification;

22 (2) No later than November 19, 2025, Google shall file either two opposition briefs or a single
23 40-page opposition brief on disgorgement and injunctive relief, and Plaintiffs shall file
24 their opposition brief on class decertification;

25 (3) No later than December 4, 2025, Plaintiffs shall file either two reply briefs or a single 25-
26 page reply brief on disgorgement and injunctive relief, and Google shall fill its reply brief
27 on class decertification;

(4) No later than 14 days after entry of judgment, the Parties shall file any motions for fees, costs, and service awards;

(5) Opposition briefs and objections to the motion for fees, costs, and service awards shall be due no later than 35 days after the motions are due;

(6) Reply briefs in further support of the motion for fees, costs, and service awards shall be due no later than 14 days after the oppositions are due;

(7) No later than 28 days after entry of judgment, the Parties shall file any motion for a new trial, for judgment as a matter of law, or to amend the Court's findings of fact or conclusions of law on equitable remedies;

(8) Opposition briefs to post-judgment motions shall be due no later than 28 days after the motions are due; and

(9) Reply briefs in further support of post-judgment motions shall be due no later than 14 days after the oppositions are due.

A Proposed Order is submitted concurrently herewith.

IT IS SO STIPULATED.

DATED: October 2, 2025

By: /s/ Mark Mao
Mark C. Mao

Attorneys for Plaintiffs

DATED: October 2, 2025

COOLEY LLP

By: /s/ Jonathan Patchen
Jonathan Patchen

Attorneys for Google

FILER'S ATTESTATION

Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

DATED: October 2, 2025

BOIES SCHILLER FLEXNER LLP

/s/ Mark Mao

Mark C. Mao